

### REMARKS

Favorable reconsideration of this application, in light of the foregoing amendments and the following discussion, is respectfully requested. Claims 1, 6 and 13 have been amended, claims 18-20 have been added, and claims 5, 11 and 17 have been canceled. Claims 1-4, 6-10, 12-16, 18-20 remain pending in the application.

By way of background, the present application is directed to a system and method for filtering and distributing *routes*, i.e., information that tells a router where to forward packets, to sites in a Virtual Private Network (VPN) using import and re-export filters. The import filter receives the routes from a central route distributor (e.g., route reflector). The routes each has a route distinguisher, a route target, and a next hop routing information. The import filter accepts a first subset of the routes according to an import target policy. The re-export filter also receives the routes, modifies the route distinguisher, the route target, and the next hop information of a second subset of the routes, and distributes the modified routes.

The independent claims 1, 6 and 13 have been amended to more clearly define the claimed invention. Specifically, the amended independent claims 1, 6 and 13 recite filtering and distributing routes to sites in a VPN using the import and export filters.

### CLAIM REJECTIONS UNDER 35 USC 102(e)

The rejection of claims 1-3, 5-9, 11-15 and 17 under 35 USC 102(e) as being anticipated by U.S. Patent No. 6,864,614 to Rekhter et al. (the "Rekhter reference") is respectfully traversed. It is respectfully submitted that the examiner is confusing "routes" with packets. The route is the information, e.g., the address of the next hop, that a router uses to forward packets. The claims pertain to methods and systems for distributing this routing information to routers in a VPN so that they will properly forward packets.

The Examiner cites Figs. 1 and 7, lines 53-65 of column 6, lines 30-38 of column 7, and lines 31-48 of column 8 in support of the rejection. Figs. 1 and 7 of the Rekhter reference shows how a packet originating from a customer edge router CE2 is forwarded to another customer edge router CE1 utilizing an egress router field and an egress channel field without requiring transit routers P1 and P2 to maintain VPN-specific information. The egress router field is a tag

that a transit router (e.g., P2) uses to map to the next hop in the route to an egress edge router (e.g., PE1). The egress channel field is a tag that a provider edge router (e.g., PE1) can interpret as specifying its interface with a customer edge router (e.g., CE1) or as otherwise representing the channel that links it to a particular VPN (e.g., VPN V). As explained in line 53 of column 6 through line 38 of column 7 of the Rekhter reference, a packet is forwarded from CE2 to CE1 via a provider edge router PE2, transit routers P1 and P2 and a provider edge router PE1. The transit routers utilize the egress router field to forward the packet to the next hop until the packet reaches the egress router PE1, and the egress router PE1 utilizes the egress channel field to forward the packet to the VPN V as opposed to the VPN W. Lines 31-48 of column 7 describes the process of attaching the tag (i.e., transit router field) to allow the transit routers to forward the packet to the next hop. The cited passages do not disclose or teach how *routes* are distributed to routers in a network. More importantly, the cited passages do not disclose or teach the use of import and re-export filters for filtering, modifying and distributing the *routes*. Accordingly, the Rekhter reference cannot anticipate the independent claims 1, 6 and 13. Applicants respectfully request allowance of claims 1, 6 and 13.

Claims 2-4, 7-10, and 13-16 depend from the independent claims 1, 6, and 13, respectively, and these dependent claims include the limitations of the independent claims from which they depend from. Accordingly, Applicants believe these dependent claims are allowable over the Rekhter reference for at least the same reasons set forth above.

#### CLAIM REJECTIONS UNDER 35 USC 103

The Examiner rejected Claims 4, 10 and 16 under 35 USC 103(a) as being unpatentable over the Rekhter reference in view of U.S. Patent No. 6,633,563 to Lin et al. Applicants submit that Claims 4, 10 and 16 are allowable in view of the same reasons set forth above.


**CONCLUSION**

In light of the arguments set forth above, it is respectfully submitted that the application is now in allowable form. Accordingly, reconsideration and allowance of the application is respectfully requested.

It is believed that no additional fees are due at this time. If this is incorrect, Applicant hereby authorizes the Commissioner to charge any fees, other than issue fees, that may be required by this paper to Deposit Account No. 07-0153. The Examiner is respectfully requested to call Applicant's Attorney for any reasons that would advance the current application to issue. Please reference Attorney Docket No. 131105.1003.

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Respectfully submitted,  
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